

To: Commissioners

Fr: Common Carrier Staff

Date: August 30, 2019

Revised: September 6, 2019 for the September 11, 2019 Public Meeting

Re: Expedited AUSF Rulemaking Proposals

Commissioners,

In response to the renewed crisis in remittances to the AUSF and the increased likelihood that the AUSF will be soon be in a state of continual shortage due to recent downgrading of wireless revenues remitted to the fund by an as-yet unidentified carrier, the Chair has tasked Staff with brainstorming options for a possible expedited rulemaking. What follows are a series of rough-cut options, discussed at a very high level. Staff has conferred with AG Goering and he has stated that there is no legal impediment to an expedited rulemaking regarding the AUSF regulations, even with the planned 2021 sunset review adopted in R-18-001 last year.

Since the memorandum was last presented to the Commission, Staff has devised several other possible rulemaking responses for consideration. These are highlighted.

1. Complete repeal of the AUSF.

This is by far the most radical step in Staff's view given that the Commission so recently enacted R-18-001 rule changes that were designed to bridge the gap between what was an unsustainable rise in the AUSF surcharge under the old COLR/CCL support regime and the planned 2023 sunset of the AUSF. R-18-001 therefore may have created reasonable expectations in fund recipients that the ENS payments would continue in the interim. Staff also notes that the R-18-001 changes were made, including the 10% cap on the AUSF surcharge, with the distinct possibility, if not the inevitability, that the cap would result in a state of perpetual shortage, and further that the provisions in 3 AAC 53.350(e)(8) would likely lead to a significant backlog of unpaid claims in that it explicitly prioritizes the payment of old claims. Thus, Staff is concerned that repealing the AUSF in its entirety simply because of the premature appearance of the predictable effects of the R-18-001 reforms may generate political backlash from dashed carrier expectations. Staff also believes there remains a strong imperative to support legitimately rural telecommunications in Alaska.

If, however, the Commissioners pursue a full AUSF repeal, Staff believes a strong case must be made that circumstances have changed drastically since the adoption of R-18-001 independent of the state perpetual shortage in the AUSF that appears to now exist. Staff believes the best and strongest argument to hasten the sunset of the AUSF is the enactment of SB83. Staff notes that even the smallest ENS-receiving carrier backed the ATA contention that virtually the entire market

for telecommunications in Alaska is competitive. This changed circumstance therefore, in Staff's view, provides the most reasonable basis for revisiting R-18-001's initial full repeal stance.

Staff has supplied a regulatory matrix for full repeal as part of the public meeting packet.

1(a). Repeal Current Funding Priorities, Continue Capped Surcharge to Build Corpus.

Staff highlights the fact that current AUSAC projections place the annual revenues from AUSF remittances at around \$15 million, though it is Staff's understanding that the wireless company responsible for the recent decrease in wireless remittances did not fully implement associated billing changes until July of 2019, meaning the total projected annual funds available may decrease in future years. Staff further suspects that other wireless carriers may follow suit. Staff highlights total funds available to bracket for consideration the much smaller amount of funds the Commission has to work with when reviewing options for the AUSF going forward – the days of a \$30+ million annual fund are gone.

Staff believes \$15 million will likely not be sufficient to conduct a meaningful broadband grant program, if the Commission sought to transition the fund in that direction. This is especially so if no state general funds are diverted to the purpose. In a broadband grant scenario, it may be prudent to allow multiple years of capped surcharge remittances to accumulate before awarding grants. To that end, if the Commission desired, it could repeal or significantly revise 3 AAC 53.350's disbursement priority to eliminate or phasedown ENS support while keeping the capped 10% surcharge in place, with the balance used to forward-fund a transitioned AUSF.

2. Revise the definition of remote area.

The ATA definition of remote areas that became 3 AAC 53.399(13) remains, to Staff, overbroad. That definition allowed MTA to continue to receive AUSF support for areas outside of the Municipality of Anchorage, despite the fact that the vast majority of MTA's study area is not, in Staff's view, rural or difficult to serve. Under the ENS calculation, MTA remains the biggest beneficiary.¹ Given the fact that current rules require pro-rata cuts to ENS in times of shortage, MTA's ENS payments, as well as other carriers receiving ENS for well developed, competitive telecommunications markets come at the expense of genuinely rural carriers and the customers they serve.

Staff believes it is advisable to reconsider the language in 3 AAC 53.399(13) in a way that redefines remote areas with a combination of road access and wireless coverage analysis. Staff believes the Commission should also consider expanding the effect of the remote areas qualification to eliminate all ENS, not just the COLR support portion, from carriers deemed to serve non-remote areas. The Commission could leave open the option for carriers to seek intrastate access charges from IXC's to the extent still permitted by federal law.

¹ See Exhibit DHP-1, ENS Support Calculation.

For example, the Commission could conclude that any exchange with two facilities-based wireless carriers providing service, or any exchange with a single wireless carrier with access to the general road system is non-remote and would not receive ENS. This revised definition would likely exclude the vast majority of the Mat-Su, Fairbanks and Juneau, as well as many hub communities in southeast Alaska, western Alaska, and the Interior, while reserving the remaining AUSF funds for the hardest to serve areas with the highest construction and maintenance costs and most disbursed customer-base.

The Commission could also determine to make the remote area divide based on middle mile access; any exchange not served by terrestrial middle mile would be considered remote for purposes of ENS, any exchange limited to satellite middle mile would be considered remote. Staff notes that this information is already tabulated under the Alaska Plan as carriers receiving USF high cost support under that plan must track access to middle mile for the communities they serve.

3. Eliminate DEM Weighting.

Continuing to pay DEM Weighting support has never been adequately justified, in Staff's view. Staff notes DEM Weighting support in 2019 totals over \$900,000. Targeting this support for removal invites challenge, but Staff believes that GCI affiliates continued receipt of the support does chaff at other carriers, and Staff doubts GCI will be able to defend the necessity of DEM Weighting support any better today than it did in R-18-001.

4. Revise ENS Calculation – Rolling Benchmarks.

The current ENS regulation in 3 AAC 53.346 sets the amount of support a particular carrier will receive to an amount equal to the CCL and/or COLR support the carrier received in calendar year 2016.² In a shortage situation, because of the operation of 3 AAC 53.350(e)(8) & (9), carriers can only expect a pro rata share and may eventually forgo some monthly support payments altogether. Staff believes carriers have no reasonable expectation that they will receive the full amount of ENS support, however, there is some concern that once a claim accrues, and there may be a good faith obligation to manage the fund so as to pay that accrued claim. And Staff notes that nothing in 3 AAC 53.346 revises the ENS disbursement goal to meet realities of a perpetual shortage situation.

Staff proposes to revise 3 AAC 53.346 so that the future year's ENS entitlement is pegged at a level no higher than the prior year's disbursement. If the fund is solvent and can pay 2016 support levels, so be it. But if, for instance, carriers only receive 85% of the 2016 support in 2019, that becomes the new benchmark for payments in the following year. It may be more workable for AUSAC if the Commission were to redefine it as a monthly support payment based on an 11-month average in the prior year, or to recalculate the monthly support quarterly based on a rolling average.

² See Exhibit DHP-1.

In Staff's view, given the likelihood of perpetual AUSF shortages, implementing this proposal would more closely align carriers' expectations for funds with the actual disbursements the capped AUSF surcharge can, in reality, cover. It also helps mitigate backlogged support payments should remittances to the AUSF level off at some point. Staff also notes that this would affect all carriers across the board unless combined with some of the other proposals suggested herein.

4(a). Eliminate COLR portion of ENS Payments.

As discussed, with R-18-001, the Commission adopted an ENS regime that fixed support payments to local exchange carriers commensurate with COLR and/or CCL support received in calendar year 2016. The current regulation in 3 AAC 53.346 details three different funding scenarios dependent on whether a carrier serves a newly-defined "remote area" and whether the carrier received COLR support under the AUSF regime in place prior to R-18-001. Staff notes that COLR support was tied, in part, to augmented COLR duties and obligations contained in 3 AAC 53.265. However the recent passage of SB 83, which becomes effective near the end of November of 2019, specifically precludes the Commission from making any COLR designation of any kind and assigning any COLR duties to carriers whatsoever. To the extent the Commission agrees with Staff that ENS payments were designed to provide some recompense for the duties and obligations associated with COLR, that portion of ENS that relates to historic COLR support can and should be eliminated once SB 83's blanket COLR prohibitions come into force.

Based on Staff's calculations derived from data reported by AUSAC in TA28-998, the portion of ENS attributed to historic COLR support totals approximately \$7.4 million annually.³ If that portion was eliminated from ENS going forward, Staff believes that the projected distributions from the AUSF would more closely align with the projected revenue-based remittances based on a capped fund. Even if a shortfall situation persists, the accumulation of outstanding unpaid support payments would be far less than the current projected \$740,000+ monthly shortfall, and therefore more manageable. If this decision is coupled with the proposal to institute rolling benchmarks for ENS monthly payments as discussed above, the shortfall issue would be further mitigated.

Staff notes that while simplicity is the main feature of this proposal, its main drawback is that it is highly regressive from a remote areas standpoint. Carriers serving what Staff believes are objectively more rural and remote areas will lose the same support as carriers serving on the road system, with easy access to terrestrial middle mile. Therefore, the Commission may decide it is more equitable to address the more thorny "remote areas" definition discussed above.

5. Raise the cap.

Staff notes that the Commission could always raise the AUSF surcharge cap above its current 10% level if it feels strongly that full payment of ENS to all carriers is worthwhile. Staff notes that this

³ Exhibit DHP-1, at 1.

would retreat from some of the gains from R-18-001, the impetus of which was to get a firm grip on the fund and limit consumer exposure to escalating surcharges. While R-18-001 trimmed AUSF disbursements significantly, it did so, in Staff's view, by eliminating several programs (state Lifeline support, public interest pay telephone support) that served Alaska's most marginal consumers. While details of the significantly diminished wireless revenue reported in 2019 remain obscured by confidentiality concerns, Staff believes it is reasonable to conclude that a decision by a major wireless carrier to attribute a greater proportion of that carrier's annual revenue to broadband/information services is the likely culprit. This means that consumers that do not and in some cases cannot access broadband services to meet their communications needs will be left supporting ENS and DEM Weighting payments to local exchange carriers. Staff does not believe this is equitable, especially when those same traditional telephone consumers are also responsible for paying the up-to-\$5.25 network access fee.

6. Revise the contribution base – Per Connection.

Another way to increase AUSF funding levels that Staff explored in R-18-001 was the possibility of joining other states that have transitioned their state USFs to connection based contributions to avoid much of the billing arbitrage that wireless carriers are engaged in – the same issue that continues to plague the AUSF. Staff believes that, like other states, while revenues associated with traditional telecommunications have sharply decreased, the number of connections utilizing the intrastate telecommunications network has remained relatively stable.

During R-18-001, Staff had been researching, among other states with per connection contribution requirements, Nebraska's hybrid approach, which treats residential service differently than business service. In Nebraska, residential service remittances are based on a backfilled per connection fee, currently set at \$1.75 per month, while business services pay a revenue-based service charge on the theory that a single business number/connection could serve several or hundreds of extensions and result in unfair contribution levels skewed toward residential users.

See

https://psc.nebraska.gov/sites/psc.nebraska.gov/files/doc/NUSF_Remittance_Presentation.pptx

This, however, is not a long term fix that can be quickly vetted and enacted on an expedited basis. Staff intends to continue reviewing it regardless for the 2021 sunset review, if that provision survives.

7. Revise Payment Priority

As noted above, 3 AAC 53.350(e)(8) prioritizes the payment of old claims before current claims. Staff believes reverting back to the ATA proposal on this in R-17-001 is likely the least controversial solution presented in this memorandum.

3 AAC 53.350(e) currently reads:

The administrator shall disburse the AUSF in the following order of priority: (1) administrative costs; (8) other universal service support programs listed in (a) of this section [ENS and DEM Weighting], **oldest claims first**, pro-rated among claimants within a monthly accounting period based on the total unpaid claims for that period; (9) valid claims for universal service support accrued before March 17, 2018; except for those claims, the administrator may not pay any claim that remains unpaid more than six months after accrual.

Staff would revise 3 AAC 53.350(e) as follows:

The administrator shall disburse the AUSF in the following order of priority: (1) administrative costs; (8) for other universal service support programs listed in (a) of this section (i) unpaid claims accruing prior to XX/XX/XX; [OLDEST CLAIMS FIRST, PRO-RATED AMONG CLAIMANTS WITHIN A MONTHLY ACCOUNTING PERIOD BASED ON THE TOTAL UNPAID CLAIMS FOR THAT PERIOD]; (ii) current month claims; and (iii) other unpaid claims of support. All claims shall be pro-rated as needed among claimants within the monthly accounting period based on the total based on the total unpaid claims for that period. (9) [VALID CLAIMS FOR UNIVERSAL SERVICE SUPPORT ACCRUED BEFORE MARCH 17, 2018; EXCEPT FOR THOSE CLAIMS,] the administrator may not pay any claim that remains unpaid more than six months after accrual.

By striking the phrase “oldest claims first,” Staff believes the Commission would avoid the backlog of unpaid claims issue by allowing old unpaid claims to more easily expire under subsection (9). Also, because it is likely that a regulation fix to this provision cannot be effectuated before missed payments accrue, and because those payments would have accrued at a time when they would be paid first, Staff preserves priority to viable unpaid claims accruing before the effective date of the proposed rule change to 3 AAC 53.350(e).



Alaska Universal Service Administrative Company

**810 N Street
Suite 204
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August 30, 2019

Regulatory Commission of Alaska
701 W. 8th Avenue, Suite 300
Anchorage, AK 99501

Reference: AUSAC Notice of Decrease in Reported Wireless Revenues

Commissioners,

The AUSAC Board has reviewed a decrease in the reported wireless revenues beginning with the February 2019 period.

The decline in reported wireless revenue was attributed to a company implementing upgrades to their billing system. The decline was identified, in March 2019, through AUSAC's monthly revenue review process. Over the following months AUSAC has contacted the company to request an explanation for the decline and additional information to allow the AUSAC Board of Directors to review and understand the methodology the company is using to identify the AUSF assessable revenue. The company provided responses to AUSAC's requests for information and the AUSAC Board of Directors reviewed the information over the course of several board meetings. The company responses were limited in detail due to concerns with the highly sensitive and competitive nature of the information.

The AUSAC Board completed its due diligence and is satisfied with the information provided and finds that the response from the company was acceptable, understanding this information has been presented by the company to USAC and FCC staff and also Chairman Pickett with the Regulatory Commission of Alaska.

The decline in reported wireless revenue will result in a projected 12.5% decrease in the estimated 2019 total revenues as compared to the filed estimated 2019 revenues, found in the Third Supplemental TA28-998. Based on the revised estimated 2019 revenues, the revised 2019 surcharge rate is now calculated at 13.2%. The originally calculated 2019 surcharge rate, filed in the Third Supplemental TA28-998, was 11.5%. Per 3 AAC 53.340 (d) the AUSF surcharge rate is capped at 10%. AUSAC is not requesting a rate change.

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August 30, 2019

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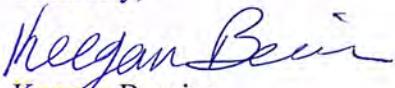
Attached is the Fund Projection through year-end 2019 with an AUSF surcharge rate of 10%. The fund is projected to collect about (\$743,000) less in monthly remittances than the approved monthly support amounts. The deficiency between the monthly remittances and the monthly support distribution is offset by using funds from the AUSF cash reserves. A shortage occurs once the AUSF cash reserves are depleted, which is projected to begin with the November 2019 period, which will be distributed in December 2019. The initial November 2019 period shortage will be approximately (\$394,000). Since January 2019 the cash reserves have been used to offset the shortage between remittances and the monthly support amounts.

The AUSF support shortages will be managed through the current shortage allocation method.

Additionally, attached under confidential cover, are the 2019 Year-to-Date Monthly Reported Revenues and Remittances for the company that has experienced the billing system upgrades and decline in reported wireless revenues. AUSAC respectfully requests that the 2019 Year-to-Date Monthly Reported Revenues and Remittances be classified as confidential under 3 AAC 48.045 as the information disclosed is financial data that is highly sensitive and competitive in nature. Competitors would significantly benefit from the disclosure of this information and members of the public would have little use for the monthly company specific revenue details. Furthermore, U-99-133(3) grants the confidential treatment of monthly company revenues.

If you have any questions, call me at 907-561-6300.

Sincerely,



Keegan Bernier
Agent

Attachments

Alaska Universal Service Administrative Company

AUSF Projection 2019

8/30/2019

Revenue Period	Projected Revenue*	AUSF Rate		10%		Available AUSF Balance
		Projected Remittances	Projected Revenue x 10% AUSF rate	Projected Distribution Amount	Distribution Surplus (Shortage)	
Jan-19	16,138,436.51	1,641,569.72	1,989,722.76	(348,153.04)	6,511,429.15	2/28/2019
Feb-19	13,007,758.49	1,301,109.64	1,988,700.55	(687,590.91)	5,834,420.24	3/30/2019
Mar-19	13,321,054.62	1,332,106.21	1,986,779.01	(654,672.80)	5,189,879.87	4/30/2019
Apr-19	12,940,055.42	1,294,012.93	2,000,128.04	(706,115.11)	4,494,011.93	5/30/2019
May-19	14,640,081.35	1,529,401.01	2,000,471.11	(471,070.10)	4,041,040.31	6/30/2019
Jun-19	12,393,809.02	1,239,382.71	1,993,305.38	(753,922.67)	3,293,188.03	7/30/2019
Jul-19	12,550,330.65	1,257,031.18	1,989,958.59	(732,927.41)	2,569,285.85	8/30/2019
Aug-19**	12,509,708.51	1,250,970.85	1,994,007.07	(743,036.22)	1,831,453.07	9/30/2019
Sep-19**	12,509,708.51	1,250,970.85	1,994,007.07	(743,036.22)	1,089,647.66	10/30/2019
Oct-19**	12,509,708.51	1,250,970.85	1,994,007.07	(743,036.22)	348,294.64	11/30/2019
Nov-19**	12,509,708.51	1,250,970.85	1,994,007.07	(743,036.22)	(394,046.16)	12/30/2019
Dec-19**	12,509,708.51	1,250,970.85	1,994,007.07	(743,036.22)	(1,137,082.38)	1/30/2020
Total	157,540,068.61	15,849,467.66	23,919,100.79			

*Projected revenues for January through July 2019 reflect actual revenues reported in that month and may include adjustments and payments made to prior periods.

** August 2019 - December 2019 Projected revenues are based on the average reported revenues for the June and July 2019 period as of August 20, 2019. This period average was used as the wireless billing system upgrades are expected to have been fully implemented by July 2019.

***Fund Balance includes interest

Place holder for Confidential Document

**2019 Year-to-Date Monthly Reported Revenues and
Remittances**

**for the company that has experienced the billing system
upgrades noted in this notice.**

Companies	COLR (TA28-998)	CCL	ENS (COLR + CCL)	DEM (Support for 2019)	Total
NonPooling		(updated July 25, 2019)			
ACS-AN					
ACS-F	\$1,157,881	\$216,509	\$1,374,390		\$1,374,390
ACS-AK Juneau		\$77,802	\$77,802		\$77,802
ACS-AK Greatland	\$184,638	\$14,789	\$199,427		\$199,427
ACS-N Glacier State	\$2,113,195	\$732,691	\$2,845,886		\$2,845,886
ACS-N Sitka	\$179,148	\$21,681	\$200,829		\$200,829
ASTAC	\$261,766	\$449,183	\$710,949		\$710,949
CTC	\$89,418	\$431,723	\$521,141		\$521,141
CVTC	\$545,167	\$1,787,484	\$2,332,651		\$2,332,651
GCI		\$2,028,447	\$2,028,447		\$2,028,447
ITC	\$463,740	\$668,644	\$1,132,384		\$1,132,384
KPU	\$325,566	\$630,188	\$955,754		\$955,754
MTA	\$1,982,117	\$3,320,926	\$5,303,043		\$5,303,043
Mukluk	\$157,669	\$190,446	\$348,115		\$348,115
Pooling		(TA28-998)			
Adak		\$508,254	\$508,254		\$508,254
ATC		\$785,988	\$785,988		\$785,988
BBTC		\$303,625	\$303,625		\$303,625
Bettles		\$3,745	\$3,745		\$3,745
Bush-Tell		\$233,799	\$233,799		\$233,799
Nushagak		\$382,933	\$382,933		\$382,933
OTZ		\$540,283	\$540,283		\$540,283
Summit		\$224,898	\$224,898	\$8,620	\$233,518
United-KUC		\$222,897	\$222,897	\$199,062	\$421,959
UUI		\$1,360,482	\$1,360,482	\$696,224	\$2,056,706
Yukon		\$61,701	\$61,701		\$61,701
Average					
Circle		\$25,057	\$25,057		\$25,057
North Country		\$66,677	\$66,677		\$66,677
Total	\$ 7,460,305	\$15,290,852	\$22,751,157	\$903,906	\$23,655,063



**Alaska Universal Service Administrative
Company**
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RECEIVED

By the Regulatory Commission of Alaska on Dec 05, 2018

December 5, 2018

Regulatory Commission of Alaska
701 W. 8th Avenue, Suite 300
Anchorage, AK 99501

Re: Tariff Advice Letter 28-998, Alaska Universal Service Fund 2019
Surcharge Factor – Third Supplemental Filing

Dear Commissioners:

Alaska Universal Service Administrative Company (AUSAC) submits this third supplemental tariff filing in compliance with the Regulatory Commission of Alaska Act and 3 AAC 48.200 – 3 AAC 48.430; 3 AAC 53.320 (a) and (b); AAC 53.340 (c) and (d). The purpose of this third supplemental filing is to submit materials to support the revised surcharge factor capped at 10%. The revised surcharge factor tariff sheets were filed in the Second Supplemental Filing to TA28-998 on November 28, 2018. Additionally, this Third Supplemental Filing requests approval of the 10% surcharge factor and suspension of TA28-998.

The materials supporting the revised surcharge factor capped at 10% have been calculated in compliance with 3 AAC 53.340 (d) from Order R-18-001(5) that was adopted by the Regulatory Commission of Alaska on October 24, 2018 and signed by the Lieutenant Governor on November 20, 2018, with an effective date of January 1, 2019, and are enclosed as Attachment A – AUSF Calculation of Annual Surcharge Third Supplemental. The revised surcharge calculation was updated to include 1) the elimination of Public Interest Pay Telephone (PIPT) and state Lifeline support, 2) the reduction of Dial Equipment Minute (DEM) support, 3) the new support element of Essential Network Support (ENS) formerly Carrier Common Line and Carrier of Last Resort, and allows sufficient funding of the support elements including AUSAC's estimated operating budget for 2019.

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December 5, 2018

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The revised calculation for the AUSF 2019 Surcharge Factor is 11.5% which is above the 10% surcharge cap,¹ therefore AUSAC requests that tariff sheet 26 and the AUSF Monthly Carrier Remittance Worksheet listed in Appendix 1 effective January 1, 2019, filed under the Second Supplemental TA28-998 filing on November 28, 2018, with a surcharge factor of 10% be approved.

To assist the Commission in its review, supporting documentation for the COLR, CCL, and DEM support paid for the year ending December 31, 2016 are also included as Attachment B.

The revised regulations refer to “...support received for the year ended December 31, 2016²” as the new annual support level effective January 1, 2019. The AUSAC Board determined that “the support paid for the year ending December 31, 2016” represents all support that was paid for the periods between January 1, 2016 through December 31, 2016, regardless of the support payment date. A period begins on the first day of the month and ends on the last day of the month and support is paid one month in arrears. For example, the December 2016 period is from December 1, 2016 through December 31, 2016 and the support is paid on January 30, 2017. The amount for the December 2016 period, although paid in 2017 is still included in the “paid for the year ending December 31, 2016” support amount discussed above.

If the December 2016 period experienced a shortage, a portion of the December 2016 period would be paid in January 2017 and the remaining portion would be paid in February 2017. Both payments made in 2017 apply to the December 2016 period and are still included in the “paid for the year ending December 31, 2016” support amount discussed above.

¹ 3 AAC 53.340(d), Order R-18-001(5) that was adopted by the Regulatory Commission of Alaska on October 24, 2018 and signed by the Lieutenant Governor on November 20, 2018, with an effective date of January 1, 2019 “The universal service surcharge factor is capped at and may not exceed 10 percent.”

² Order R-18-001(5) that was adopted by the Regulatory Commission of Alaska on October 24, 2018 and signed by the Lieutenant Governor on November 20, 2018, with an effective date of January 1, 2019. “...support received for the year ended December 31, 2016” referred in : 3 AAC 53.346(1) for CCL and no COLR support, 3 AAC 53.346(2) for CCL and COLR support in remote areas, 3 AAC 53.346(3) for CCL and COLR support in remote and non-remote areas, and 3 AAC 53.350(b) for DEM support.

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December 5, 2018

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On November 29, 2018, AUSAC issued access line data requests to companies that received CCL and COLR support for study areas that have both remote areas and areas that are not remote. The access line data was used, by AUSAC, to calculate the COLR support portion of ENS, for 2019, for remote areas in accordance with 3 AAC 53.346(3) and 3 AAC 53.399(13),³ and are included as Attachment C.

Estimated Annual Revenue Impact

Per 3 AAC 48.270 the table below lists the estimated number of AUSAC's customers, the intrastate telecommunication carriers (ITCs), affected by the rate change in this filing and the estimated annual revenue under both of the existing and proposed rates.

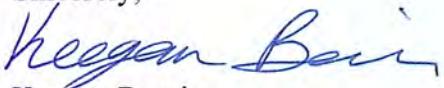
Intrastate	Existing AUSF Rate ⁴	Proposed AUSF Rate
Number of ITCs	86	98
Estimated Annual Revenues	\$33,666,969	\$17,878,129

AUSAC requests that the Regulatory Commission of Alaska approve the 10% surcharge as filed in the Second Supplemental filing to TA28-998, effective January 1, 2019.

Furthermore, AUSAC requests that TA28-998 be partially suspended and re-noticed, to allow for a complete review of the additional attachments that are enclosed in this filing without interrupting the implementation of the 10% surcharge.

If there are any questions regarding the tariff, its content, or the calculation of the surcharge, please contact me at 561-6300 or Wanda Tankersley at 907-761-2654.

Sincerely,



Keegan Bernier
Agent

Attachments

³ Order R-18-001(5) that was adopted by the Regulatory Commission of Alaska on October 24, 2018 and signed by the Lieutenant Governor on November 20, 2018, with an effective date of January 1, 2019

⁴ TA26-998 AUSF Rate of 19%, approved December 27, 2017

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TA28-998

Attachment A

AUSF

Calculation of Annual Surcharge

Schedule 1: 2019 AUSF Calculation of Surcharge Rate

Schedule 2: COLR Support

Schedule 3: CCL Support from Non Pooling Co.

Schedule 4: CCL Support for Pooling Co.

Schedule 5: DEM Support

Schedule 6: Lifeline Support

Schedule 7: PIPT

Schedule 8: 2019 Operating Budget

Schedule 9: Adjustment Factor/Projected AUSF Balance

Schedule 10: Reported Intrastate End User Revenues

Third Supplemental
December 5, 2018

Alaska Universal Service Administrative Company

2019 AUSF Calculation of Surcharge Rate

Implementation of R-18-001

Surcharge Calculation per RCA Tariff 998, Sheet 17:

$$\frac{(COLR + CCL + DEM + SLS + PIPT + O + B + A)}{GR} = \frac{\$20,533,030}{\$178,781,293} = \boxed{11.5\%} \quad 11.4850\%$$

			(2018) TA 26-998 Approved Budget. 19%	Variance between approved TA26-998 and proposed 2019
COLR (Schedule 2) Carrier of Last Resort Support Annual Revenue Requirement Estimate Based on the support paid for the year ended December 31, 2016 LESS non-remote support		\$7,460,305	\$11,158,152	\$ (3,697,847)
CCL CCL Support for NonPooling Companies (Schedule 3) Annual Revenue Requirement Estimate Based on the support paid for the year ended December 31, 2016	ENS	\$10,572,806	\$10,091,081	\$481,725
CCL Support for Pooling Companies (Schedule 4) Annual Revenue Requirement Estimate Based on the support paid for the year ended December 31, 2016		\$4,889,068	\$4,941,187	\$ (52,119)
DEM - (Schedule 5) Annual Revenue Requirement Estimate Based on 67% of DEM support paid for the year ended December 31, 2016		\$903,906	\$1,349,113	\$ (445,207)
SLS - Estimated State Lifeline Support (Schedule 6) R-18-001(5) repeals Lifeline support		\$0	\$1,303,848	\$ (1,303,848)
PIPT Public Interest Pay Telephone (Schedule 7) R-18-001(5) repeals PIPt Support		\$0	\$104,326	\$ (104,326)
O - Other AUSF Authorized Distributions		\$0	\$ -	0
B - AUSAC Budget (Schedule 8) Estimated 2019 Operating Budget		\$127,128	\$117,707	\$ 9,421
A - Adjustment Factor (Schedule 9)*		<u>(\$3,420,183)</u>	<u>\$4,601,556</u>	<u>\$ (8,021,739)</u>
Total Estimated Support		<u>\$20,533,030</u>	<u>\$33,666,970</u>	<u>\$ (13,133,940)</u>
GR - Gross Annual End User Revenues (Schedule 10) Total Estimated Intrastate End-User Revenue		<u>\$178,781,293</u>	<u>\$177,064,270</u>	<u>\$1,717,023</u>

* AUSF balance excess is deducted and the deficiency is added.

Alaska Universal Service Administrative Company

AUSF Calculation of Surcharge
Carrier of Last Resort Support

Companies	Total COLR Annual Support	LESS: Non-Remote Area COLR*	COLR Support Paid for 2016**
ACS-Fairbanks	1,157,881	(786,177)	1,944,058
ACS- Greatland (FTW)	184,638		184,638
ACS-Juneau	-	(616,793)	616,793
ACS-GST	2,113,195		2,113,195
ACS-Sitka	179,148		179,148
ASTAC	261,766		261,766
CTC	89,418		89,418
CVTC	545,167		545,167
Interior-TelAlaska	463,740		463,740
KPU	325,566		325,566
MTA	1,982,117	(474,342)	2,456,459
Mukluk-TelAlaska	157,669		157,669
Total	\$ 7,460,305	\$ (1,877,312)	\$ 9,337,617
Estimated Monthly Distribution	\$ 621,692		

* Per 3 AAC 53.346(3) (Effective December 20, 2018) Carriers that provide service in a study area that has both remote and non-remote areas that previously received COLR support will now receive, as a portion of Essential Network Support (ENS), an amount equal to the amount of COLR support received for the year ended December 31, 2016. The amount of COLR support for remote areas will be determined based on the percentage of access lines in the remote area, using the average of January 2016 and December 2016 line counts. Line counts and the percentage of access lines were provided by the company.

** Per 3 AAC 53.346(2) (Effective December 20, 2018) Carriers that provide service in a study area that has remote areas that previously received COLR support will now receive, as a portion of Essential Network Support (ENS), an amount equal to the amount of COLR support received for the year ended December 31, 2016.

Alaska Universal Service Administrative Company

First Revised CCL Support Paid for the Year Ending December 31, 2016

7/23/2019

Total NonPooled AUSAC CCL Support Paid for 2016			
Company	TA28-998	Adjustment 7/30/19	Revised Total CCL Support Paid for 2016
ACSA-FTW	14,789	-	14,789
ACSA-Juneau	77,802	-	77,802
ACS- Fairbanks	216,509	-	216,509
ACS-GST	732,691	-	732,691
ACS-Sitka	21,681	-	21,681
GCI	2,028,447	-	2,028,447
ASTAC	451,476	(2,293)	449,183
Cordova	431,723	-	431,723
CVTC	1,787,484	-	1,787,484
Interior	668,644	-	668,644
KPU	630,188	-	630,188
MTA	3,320,926	-	3,320,926
Mukluk	190,446	-	190,446
Total	10,572,806	(2,293)	10,570,513

Alaska Universal Service Administrative Company

AUSF Calculation of Surcharge

Carrier Common Line Support for Pooling Companies

CCL Pooling Companies	Total Estimated Annual CCL Support for Pooling Companies*	CCL Support Paid for 2016
<u>Cost Companies</u>		
Adak Eagle Enterprises	\$ 508,254	\$ 508,254
ATC	\$ 785,988	\$ 785,988
BBTC	\$ 303,625	\$ 303,625
Bettles	\$ 3,745	\$ 3,745
Bush-Tell	\$ 233,799	\$ 233,799
Nushagak	\$ 382,933	\$ 382,933
OTZ	\$ 540,283	\$ 540,283
Summit	\$ 224,898	\$ 224,898
United KUC	\$ 222,897	\$ 222,897
United Utilities	\$ 1,360,482	\$ 1,360,482
Yukon	\$ 61,701	\$ 61,701
Subtotal	\$ 4,628,605	\$ 4,628,605
<u>Average Schedule Companies</u>		
Circle Telephone Co.	\$ 25,057	\$ 25,057
North Country Telephone	\$ 66,677	\$ 66,677
Subtotal	\$ 91,734	\$ 91,734
Total	\$ 4,720,339	\$ 4,720,339
AECA CCL Revenue Requirement (Docket U17-096))	\$ 168,729	\$ -
Total CCL Revenue Requirement	\$ 4,889,068	\$ 4,720,339
Estimated Monthly Distribution		407,422.33

* Per 3 AAC 53.346(1) (Effective December 20, 2018) Carriers that previously received CCL support will now receive Essential Network Support (ENS) in an amount equal to the amount of carrier common line support received for the year ended December 31, 2016.

Alaska Universal Service Administrative Company

AUSF Calculation of Annual Surcharge

DEM Support

Company	Estimated Annual Support for 2019	67% of 2016 DEM*	DEM Support Paid for 2016
SUMMIT	\$8,620	\$8,620	\$12,865
UUI	\$696,224	\$696,224	\$1,039,141
United KUC	\$199,062	\$199,062	\$297,107
	\$903,906	\$903,906	\$1,349,113
Estimated Monthly Distribution	\$ 75,326		

* Per 3 AAC 53.350(b) (Effective December 20, 2018) Beginning January 1, 2019 AUSAC shall distribute 67 percent of the DEM support paid for year ended December 31, 2016.

Schedule 5

Alaska Universal Service Administrative Company

AUSF Calculation of Annual Surcharge

Lifeline Support

Company	Estimated 2019 Monthly Lifeline Accounts	Estimated Annual Support (\$0.00 X 12 months)
ACSA-FTW	1	-
ACSA-JUN	27	-
ACS-Anchorage	239	-
ACS-FBKS	91	-
ACSN-GST	374	-
ACSN-SITKA	142	-
Adak	3	-
Alaska Telephone Company	475	-
ASTAC	18	-
Bettles Telephone Co.	13	-
Bristol Bay Telephone Cooperative	40	-
Bush-Tell, Inc.	64	-
Circle Telephone Co.	28	-
Copper Valley Telephone	106	-
Cordova Telephone	55	-
KPU	146	-
MTA	577	-
North Country Telephone	17	-
Nushagak Electric & Telephone	36	-
OTZ Telephone Cooperative	50	-
Summit Telephone	9	-
TelAlaska/Interior	190	-
TelAlaska/Mukluk	73	-
United KUC	16	-
United Utilities, Inc.	433	-
Yukon Telephone Co.	4	-
Total	3,227	\$ -
<hr/>		
CETC		
<hr/>		
ASTAC Wireless	16	-
Bristol Bay Cellular	15	-
Copper Valley Wireless	50	-
GCI Includes Local and Wireless	23,181	-
OTZ Telecommunications Inc.	29	-
TelAlaska Cellular	86	-
Total	23,377	\$ -
Total Lifeline	26,604	\$ -

Source: Company Provided Information

R-18-001(5) repeals Lifeline support

Schedule 6

Third Supplemental TA28-998

Exhibit DHP-1

AUSF Support Distributions by Carrier

Page 11 of 23

Alaska Universal Service Administrative Company

AUSF Calculation of Annual Surcharge
Public Interest Pay Telephones

PIPT Company	Aug-18	Estimated 2019
	Current Distribution	Annual Distributioin
ASTAC	314.62	0
BBTC	515.33	0
CVTC	2,445.83	0
Interior	183.89	0
KPU	313.08	0
MTA	1,054.70	0
Mukluk	351.22	0
OTZ	387.86	0
Summit	89.62	0
United KUC	35.17	0
United Utilities	2,990.42	0
Yukon	113.28	0
Total	\$8,795.02	\$0.00

Source: August 2018 Distribution

R-18-001(5) repeals PIPT support

Schedule 7

TA28-998

Attachment A

AUSF

Calculation of Annual Surcharge

Schedule 8: 2019 Operating Budget

Schedule 8 AUSAC 2019 Budget
Filed in TA28-998 October 1, 2018

No changes have been made to the AUSAC 2019 Budget

Third Supplemental
December 5, 2018

Alaska Universal Service Administrative Company

AUSF Calculation of Annual Surcharge

Adjustment Factor/Projected AUSF Balance

AUSF History	(A)=(B)-(C)	(B)	(C)=(D)+(E)	
	Balance	Remittance	Interest Income	Total Distribution
Subtotal 1999 AUSF	286,071.09	3,738,651.25	0.00	3,452,580.16
Subtotal 2000 AUSF	391,714.75	4,009,706.32	0.00	3,617,991.57
Subtotal 2001 AUSF	(341,527.65)	1,234,183.32	27,963.38	1,603,674.35
Subtotal 2002 AUSF	(99,223.12)	1,768,702.77	7,454.15	1,875,380.04
Subtotal 2003 AUSF	(5,655.00)	2,170,950.12	2,504.32	2,179,109.44
Subtotal 2004 AUSF	55,383.76	3,075,113.32	1,654.81	3,021,384.37
Subtotal 2005 AUSF	32,434.40	3,361,183.54	7,512.14	3,336,261.28
Subtotal 2006 AUSF	475,993.97	4,288,029.01	24,212.01	3,836,247.05
Subtotal 2007 AUSF	956,193.52	4,719,544.95	43,790.66	3,807,142.09
Subtotal 2008 AUSF	(1,095,207.89)	3,040,932.59	23,530.75	4,159,671.23
Subtotal 2009 AUSF	(434,340.88)	3,923,388.25	8,761.29	4,366,490.42
Subtotal 2010 AUSF	472,419.01	5,037,854.71	1,494.26	4,566,929.96
Subtotal 2011 AUSF	1,448,846.05	16,584,300.28	2,079.79	15,137,534.02
Subtotal 2012 AUSF	415,458.70	30,631,836.49	4,800.55	30,221,178.34
Subtotal 2013 AUSF	274,031.14	29,505,235.91	5,480.99	29,236,685.76
Subtotal 2014 AUSF	(1,300,851.43)	27,053,757.73	4,810.31	28,359,419.47
Subtotal 2015 AUSF	(925,825.50)	26,689,956.54	3,918.53	27,619,700.57
Subtotal 2016 AUSF	(600,027.42)	26,898,008.03	1,318.29	27,499,353.74
Subtotal 2017 AUSF	(4,887.50)	27,788,850.61	3,532.67	27,797,270.78
2018				
January	0.00	3,008,626.61	485.30	3,009,111.91
February	422,947.66	3,092,736.68	64,084.06	2,733,873.08
March	751,353.61	3,107,286.30	1,220.88	2,357,153.57
April	498,952.38	2,856,671.03	1,660.09	2,359,378.74
May	714,977.48	3,066,432.12	2,420.48	2,353,875.12
June	755,393.92	3,089,731.01	7,316.23	2,341,653.32
July	679,572.41	3,008,608.03	4,403.68	2,333,439.30
August	629,497.91	3,031,237.25	5,311.78	2,407,051.12
September	528,411.91	2,919,523.01	5,509.82	2,396,620.92
October	758,354.78	3,144,776.14	8,353.45	2,394,774.81
PROJECTED				
November	639,472.22	3,032,562.82	6,391.68	2,399,482.28
December	639,472.22	3,032,562.82	6,391.68	2,399,482.28
Subtotal 2018 AUSF	7,018,406.50	36,390,753.82	113,549.14	29,485,896.46
Cumulative Total at Year End 2018 AUSF	7,019,406.50	261,910,939.56	288,368.04	255,179,901.10
Adjustment Factor - excess (deficiency)	<u>3,420,183.07</u>			

Notes:

Projected Balance at 12/31/2019: The projected remittance is based on the average of the remittances for January through October which were based off the 19% AUSF Rate. The interest Income of \$6,391.68 is an average of August through October actual interest. The projected distribution is the average of the August through October distribution amounts.

Working Capital Allowance is from RCA Staff Recommendation, TA2-998, November 18, 1999, Page 5, 1.5 times AUSAC monthly distribution.

Schedule 9

Alaska Universal Service Administrative Company

AUSF Calculation of Annual Surcharge

Reported Intrastate End User Revenues

Total Reported Revenues		Total	Local Revenue	Wireless Revenue	Interexchange Revenue	Payphone Revenue	Other Revenue	Uncollectible Revenue	VoIP
Total Reported Revenues 8/1/2017 - 7/31/2018	a	\$ 190,192,865.42	\$ 79,973,030.80	\$ 95,739,663.95	\$ 14,522,174.64	\$ 38,883.05	\$ 303,668.51	\$ (1,046,527.46)	\$ 661,971.93
Total Reported Revenues 8/1/2016 - 7/31/2017*	b	\$ 204,067,346.62	\$ 84,207,042.11	\$ 104,277,784.60	\$ 15,805,828.74	\$ 38,883.05	\$ 204,380.54	\$ (1,025,280.91)	\$ 558,708.49
Percent change between years	c =a/b	-6.00%	-5.03%	-8.19%	-8.12%	0.00%	48.58%	2.07%	N/A
Estimated Decrease in Reported Revenues	d = a*c	\$ (11,411,571.93)							
Estimated Total Reported Revenues	e=a+d	\$ 178,781,293.49							

TA28-998

Attachment B

AUSF

**COLR, CCL and DEM Support Paid
For the Year Ending December 31, 2016**

**Third Supplemental
December 5, 2018**

Alaska Universal Service Administrative Company

COLR, CCL, and DEM Support Paid for 2016

12/5/2018

Period	AUSAC COLR Support Paid For 2016																	
	1/1/2016			2/1/2016			3/1/2016			4/1/2016			5/1/2016			6/1/2016		
	Current Period COLR	COLR Shortage	Total	Current Period COLR	COLR Shortage	Total	Current Period COLR	COLR Shortage	Total	Current Period COLR	COLR Shortage	Total	Current Period COLR	COLR Shortage	Total	Current Period COLR	COLR Shortage	Total
Distribution date	2/29/2016			3/30/2016			4/29/2016			5/30/2016			6/30/2016			7/29/2016		
ACS-FTW	15,179	-	15,179	15,179	-	15,179	15,179	-	15,179	15,179	-	15,179	15,179	-	15,179	15,179	-	15,179
ACS-Fairbanks	154,634	-	154,634	154,634	-	154,634	154,634	-	154,634	154,634	-	154,634	154,634	-	154,634	154,634	-	154,634
ACS-Juneau	50,294	-	50,294	50,294	-	50,294	50,294	-	50,294	50,294	-	50,294	50,294	-	50,294	50,294	-	50,294
ACS-GST	160,850	-	160,850	160,850	-	160,850	160,850	-	160,850	160,850	-	160,850	160,850	-	160,850	160,850	-	160,850
ACS-Sitka	13,784	-	13,784	13,784	-	13,784	13,784	-	13,784	13,784	-	13,784	13,784	-	13,784	13,784	-	13,784
ASTAC	19,588	-	19,588	19,588	-	19,588	19,588	-	19,588	19,588	-	19,588	19,588	-	19,588	19,588	-	19,588
Cordova	6,789	-	6,789	6,789	-	6,789	6,789	-	6,789	6,789	-	6,789	6,789	-	6,789	6,789	-	6,789
CVTC	44,786	-	44,786	44,786	-	44,786	44,786	-	44,786	44,786	-	44,786	44,786	-	44,786	44,786	-	44,786
Interior	36,385	-	36,385	36,385	-	36,385	36,385	-	36,385	36,385	-	36,385	36,385	-	36,385	36,385	-	36,385
KPU	25,533	-	25,533	25,533	-	25,533	25,533	-	25,533	25,533	-	25,533	25,533	-	25,533	25,533	-	25,533
MTA	184,512	-	184,512	184,512	-	184,512	184,512	-	184,512	184,512	-	184,512	184,512	-	184,512	184,512	-	184,512
Mukluk	12,207	-	12,207	12,207	-	12,207	12,207	-	12,207	12,207	-	12,207	12,207	-	12,207	12,207	-	12,207
Total	724,541			724,541			724,541			724,541			724,541			724,541		

**Current Period COLR* includes COLR distributions specific to the distribution period and distribution date. No shortage or distributions for other periods are included.*

Shortages are reflected in the periods they apply to.

Totals are rounded to the nearest integer

Period	AUSAC COLR Support Paid For 2016																	
	7/1/2016			8/1/2016			9/1/2016			10/1/2016			11/1/2016			12/1/2016		
	Current Period COLR	COLR Shortage	Total	Current Period COLR	COLR Shortage	Total	Current Period COLR	COLR Shortage	Total	Current Period COLR	COLR Shortage	Total	Current Period COLR	COLR Shortage	Total	Current Period COLR	COLR Shortage	Total
Distribution date	8/30/2016			9/30/2016			10/28/2016			11/30/2016			12/30/2016			1/30/2017		
ACS-FTW	15,179	-	15,179	15,677	-	15,677	15,677	-	15,677	15,677	-	15,677	15,677	-	15,677	15,677	-	15,677
ACS-Fairbanks	154,634	-	154,634	172,324	-	172,324	172,324	-	172,324	172,324	-	172,324	172,324	-	172,324	172,324	-	172,324
ACS-Juneau	50,294	-	50,294	52,947	-	52,947	52,947	-	52,947	52,947	-	52,947	52,947	-	52,947	52,947	-	52,947
ACS-GST	160,850	-	160,850	197,449	-	197,449	197,449	-	197,449	197,449	-	197,449	197,449	-	197,449	197,449	-	197,449
ACS-Sitka	13,784	-	13,784	16,532	-	16,532	16,532	-	16,532	16,532	-	16,532	16,532	-	16,532	16,532	-	16,532
ASTAC	19,588	-	19,588	24,930	-	24,930	24,930	-	24,930	24,930	-	24,930	24,930	-	24,930	24,930	-	24,930
Cordova	6,789	-	6,789	8,379	-	8,379	8,379	-	8,379	8,379	-	8,379	8,379	-	8,379	8,379	-	8,379
CVTC	44,786	-	44,786	46,333	-	46,333	46,333	-	46,333	46,333	-	46,333	46,333	-	46,333	46,333	-	46,333
Interior	36,385	-	36,385	41,809	-	41,809	41,809	-	41,809	41,809	-	41,809	41,809	-	41,809	41,809	-	41,809
KPU	25,533	-	25,533	29,367	-	29,367	29,367	-	29,367	29,367	-	29,367	29,367	-	29,367	29,367	-	29,367
MTA	184,512	-	184,512	232,975	-	232,975	232,975	-	232,975	232,975	-	232,975	232,975	-	232,975	232,975	-	232,975
Mukluk	12,207	-	12,207	14,444	-	14,444	14,444	-	14,444	14,444	-	14,444	14,444	-	14,444	14,444	-	14,444
Total	724,541			853,166		9,337,617												

**Current Period COLR* includes COLR distributions specific to the distribution period and distribution date. No shortage or distributions for other periods are included.*

Shortages are reflected in the periods they apply to.

Totals are rounded to the nearest integer

Update 7/24/2019

Alaska Universal Service Administrative Company

First Revised CCL Support Paid for the Year Ending December 31, 2016

7/23/2019

Period	NonPooled AUSAC CCL Support Paid For 2016															
	1/1/2016				2/1/2016				3/1/2016				4/1/2016			
	Current Period CCL ¹	CCL Shortage ²	CCL Adjustment ³	Revised Total	Current Period CCL ¹	CCL Shortage ²	CCL Adjustment ³	Revised Total	Current Period CCL ¹	CCL Shortage ²	CCL Adjustment ³	Revised Total	Current Period CCL ¹	CCL Shortage ²	CCL Adjustment ³	Revised Total
Distribution date	2/29/2016			7/30/2019	3/30/2016			7/30/2019	4/29/2016			7/30/2019	5/30/2016			7/30/2019
ACSA-FTW	1,236.24	-	-	1,236.24	1,224.74	-	-	1,224.74	1,216.12	-	-	1,216.12	1,247.75	-	-	1,247.75
ACSA-Juneau	5,697.40	-	-	5,697.40	5,814.42	-	-	5,814.42	5,180.05	-	-	5,180.05	5,135.22	-	-	5,135.22
ACS- Fairbanks	18,876.13	-	-	18,876.13	18,923.25	-	-	18,923.25	17,910.05	-	-	17,910.05	17,739.32	-	-	17,739.32
ACS-GST	64,560.30	-	-	64,560.30	64,148.80	-	-	64,148.80	62,406.73	-	-	62,406.73	61,932.04	-	-	61,932.04
ACS-Sitka	2,240.58	-	-	2,240.58	1,821.55	-	-	1,821.55	1,919.46	-	-	1,919.46	1,842.06	-	-	1,842.06
GCI	172,665.52	-	-	172,665.52	169,263.80	-	-	169,263.80	169,713.36	-	-	169,713.36	169,952.09	-	-	169,952.09
ASTAC	38,497.36	-	(91.25)	38,406.11	38,178.90	-	(176.15)	38,002.75	38,200.58	-	(206.24)	37,994.34	38,083.01	-	(194.74)	37,888.27
Cordova	35,568.70	-	-	35,568.70	26,568.46	-	-	26,568.46	43,984.00	-	-	43,984.00	36,167.15	-	-	36,167.15
CVTC	146,508.66	-	-	146,508.66	145,757.61	-	-	145,757.61	146,275.38	-	-	146,275.38	146,963.76	-	-	146,963.76
Interior	56,294.06	-	-	56,294.06	55,898.46	-	-	55,898.46	56,098.01	-	-	56,098.01	55,837.39	-	-	55,837.39
KPU	53,142.26	-	-	53,142.26	52,974.26	-	-	52,974.26	52,779.90	-	-	52,779.90	52,773.96	-	-	52,773.96
MTA	284,916.42	-	-	284,916.42	283,296.77	-	-	283,296.77	281,407.16	-	-	281,407.16	280,627.74	-	-	280,627.74
Mukluk	16,275.76	-	-	16,275.76	16,135.58	-	-	16,135.58	16,179.32	-	-	16,179.32	16,076.86	-	-	16,076.86
Total⁴				896,388				879,830				893,064				884,184

Period	NonPooled AUSAC CCL Support Paid For 2016															
	5/1/2016				6/1/2016				7/1/2016				8/1/2016			
	Current Period CCL ¹	CCL Shortage ²	CCL Adjustment ³	Revised Total	Current Period CCL ¹	CCL Shortage ²	CCL Adjustment ³	Revised Total	Current Period CCL ¹	CCL Shortage ²	CCL Adjustment ³	Total	Current Period CCL ¹	CCL Shortage ²	CCL Adjustment ³	Revised Total
Distribution date	6/30/2016			7/30/2019	7/29/2016			7/30/2019	8/30/2016	9/30/2016	7/30/2019		9/30/2016	10/28/2016	7/30/2019	
ACSA-FTW	1,219.00	-	-	1,219.00	1,236.25	-	-	1,236.25	1,163.75	78.25	-	1,242.00	875.39	343.61	-	1,219.00
ACSA-Juneau	5,003.14	-	-	5,003.14	5,004.71	-	-	5,004.71	4,861.87	323.53	-	5,185.40	3,867.56	1,522.87	-	5,390.43
ACS- Fairbanks	17,695.81	-	-	17,695.81	17,651.67	-	-	17,651.67	16,493.48	1,095.00	-	17,588.48	12,672.31	4,992.98	-	17,665.29
ACS-GST	61,270.97	-	-	61,270.97	60,662.77	-	-	60,662.77	56,423.27	3,743.36	-	60,166.63	43,225.40	17,034.47	-	60,259.87
ACS-Sitka	1,508.21	-	-	1,508.21	1,238.61	-	-	1,238.61	1,543.71	103.45	-	1,647.16	1,211.32	476.01	-	1,687.33
GCI	170,124.35	-	-	170,124.35	169,412.15	-	-	169,412.15	157,750.82	10,463.90	-	168,214.72	120,736.08	47,584.12	-	168,320.20
ASTAC	37,623.99	-	(220.99)	37,403.00	37,385.65	-	(219.08)	37,166.57	35,159.69	2,333.05	(212.75)	37,279.99	26,759.90	10,545.13	(228.28)	37,076.75
Cordova	36,730.20	-	-	36,730.20	36,732.59	-	-	36,732.59	34,416.12	2,283.76	-	36,700.48	26,390.76	10,399.64	-	36,790.40
CVTC	148,138.00	-	-	148,138.00	150,767.33	-	-	150,767.33	142,658.29	9,462.94	-	152,121.23	108,812.32	42,883.37	-	151,695.69
Interior	56,008.72	-	-	56,008.72	55,904.52	-	-	55,904.52	52,632.34	3,491.93	-	56,124.27	40,546.56	15,978.69	-	56,525.25
KPU	52,751.76	-	-	52,751.76	53,101.91	-	-	53,101.91	49,170.49	3,300.11	-	53,040.30	37,905.70	14,937.88	-	52,843.58
MTA	276,979.48	-	-	276,979.48	278,256.10	-	-	278,256.10	259,993.25	17,245.23	-	277,238.48	198,002.89	78,036.27	-	276,039.16
Mukluk	15,971.62	-	-	15,971.62	16,020.13	-	-	16,020.13	14,771.84	980.82	-	15,752.66	11,235.04	4,427.80	-	15,662.84
Total⁴				880,804				883,155				882,302				881,176

Period	NonPooled AUSAC CCL Support Paid For 2016															
	9/1/2016				10/1/2016				11/1/2016				12/1/2016			
	Current Period CCL ¹	CCL Shortage ²	CCL Adjustment ³	Revised Total	Current Period CCL ¹	CCL Shortage ²	CCL Adjustment ³	Revised Total	Current Period CCL ¹	CCL Shortage ²	CCL Adjustment ³	Revised Total	Current Period CCL ¹	CCL Shortage ²	CCL Adjustment ³	Revised Total
Distribution date	10/28/2016	11/30/2016	7/30/2019		11/30/2016	12/30/2016	7/30/2019		12/30/2016	1/30/2017	7/30/2019		1/30/2017	2/28/2017	7/30/2019	
ACSA-FTW	928.53	307.71	-	1,236.24	932.83	317.78	-	1,250.61	917.65	301.34	-	1,218.99	992.10	249.89	-	1,241.99
ACSA-Juneau	3,663.98	1,210.31	-	4,874.29	3,672.39	1,258.94	-	4,931.33	9,615.77	3,094.99	-	12,710.76	10,284.76	2,590.50	-	12,875.26
ACS- Fairbanks	12,976.03	4,282.95	-	17,258.98	13,807.50	4,740.80	-	18,548.30	14,135.41	4,546.59	-	18,682.00	14,354.01	3,615.46	-	17,969.47
ACS-GST	44,846.29	14,798.99	-	59,645.28	43,808.39	15,047.44	-	58,855.83	45,288.90	14,552.43	-	59,841.33	47,081.93	11,858.89	-	58,940.82
ACS-Sitka	1,336.66	442.38	-	1,779.04	1,454.37	496.95	-	1,951.32	1,499.07	488.08	-	1,987.15	1,644.63	414.25	-	2,058.88
GCI	127,385.82	42,035.40	-	169,421.22	125,181.17	42,998.55	-	168,179.72	126,301.92	40,573.38	-	166,875.30	132,839.15	33,465.74	-	166,304.89
ASTAC	28,073.99	9,264.74	(223.87)	37,114.86	27,764.97	9,535.81	(188.98)	37,111.80	28,013.79	9,004.03	(188.20)	36,829.62	29,596.95	7,454.81	(142.94)	36,908.82
Cordova	27,401.21	9,042.74	-	36,443.95	26,825.98	9,213.23	-	36,039.21	26,995.13	8,674.24	-	35,669.37	27,421.24	6,906.80	-	34,328.04
CVTC	114,664.43	37,836.47	-	152,500.90	111,851.41	38,423.22	-	150,274.63	112,566.64	36,153.98	-	148,720.62	118,031.00	29,729.39	-	147,760.39
Interior	42,335.37	13,970.48	-	56,305.85	41,162.50	14,138.45	-	55,300.95	41,338.71	13,277.10	-	54,615.81	42,920.12	10,810.63	-	53,730.75
KPU	39,234.96	12,947.46	-	52,182.42	39,000.95	13,395.86	-	52,396.81	38,586.70	12,393.22	-	50,979.92	40,915.51	10,305.71	-	51,221.22
MTA	205,980.10	67,967.37	-	273,947.47	202,167.93	69,449.23	-	271,947.47	203,977.53	65,513.19	-	269,490.72	213,366.62	53,742.32	-	267,108.94
Mukluk	11,648.34	3,846.19	-	15,494.53	11,607.30	3,980.90	-	15,588.20	11,873.73	3,813.59	-	15,68				

Alaska Universal Service Administrative Company

COLR, CCL, and DEM Support Paid for 2016

12/5/2018

Period	Pooled AUSAC CCL Support Paid For 2016																	
	1/1/2016			2/1/2016			3/1/2016			4/1/2016			5/1/2016			6/1/2016		
	Current Period CCL	CCL Shortage	Total	Current Period CCL	CCL Shortage	Total	Current Period CCL	CCL Shortage	Total	Current Period CCL	CCL Shortage	Total	Current Period CCL	CCL Shortage	Total	Current Period CCL	CCL Shortage	Total
Distribution date	2/29/2016			3/30/2016			4/29/2016			5/30/2016			6/30/2016			7/29/2016		
Adak Eagle Enterprises	42,310.25	-	42,310.25	42,337.27	-	42,337.27	42,383.09	-	42,383.09	42,351.47	-	42,351.47	42,345.70	-	42,345.70	42,371.01	-	42,371.01
ATC	66,443.07	-	66,443.07	66,008.23	-	66,008.23	65,591.13	-	65,591.13	64,445.19	-	64,445.19	64,602.20	-	64,602.20	64,028.75	-	64,028.75
BBTC	25,872.50	-	25,872.50	25,921.38	-	25,921.38	25,964.50	-	25,964.50	24,915.13	-	24,915.13	24,527.00	-	24,527.00	23,394.25	-	23,394.25
Bettles	320.08	-	320.08	345.20	-	345.20	339.24	-	339.24	299.18	-	299.18	314.72	-	314.72	307.53	-	307.53
Bush-Tell	19,277.01	-	19,277.01	19,463.35	-	19,463.35	19,435.79	-	19,435.79	19,444.15	-	19,444.15	19,516.15	-	19,516.15	19,483.27	-	19,483.27
Nushagak	32,936.51	-	32,936.51	32,954.50	-	32,954.50	33,090.31	-	33,090.31	33,113.39	-	33,113.39	31,839.60	-	31,839.60	30,905.57	-	30,905.57
OTZ	44,755.54	-	44,755.54	44,929.70	-	44,929.70	45,050.24	-	45,050.24	44,947.24	-	44,947.24	45,082.72	-	45,082.72	45,191.35	-	45,191.35
Summit	18,780.05	-	18,780.05	18,785.60	-	18,785.60	18,722.35	-	18,722.35	18,711.24	-	18,711.24	18,691.50	-	18,691.50	18,682.68	-	18,682.68
United KUC	18,188.63	-	18,188.63	18,164.23	-	18,164.23	18,312.46	-	18,312.46	18,420.73	-	18,420.73	18,544.63	-	18,544.63	18,637.72	-	18,637.72
United Utilities	112,778.70	-	112,778.70	112,924.64	-	112,924.64	112,943.54	-	112,943.54	113,096.95	-	113,096.95	113,130.43	-	113,130.43	113,289.23	-	113,289.23
Yukon	5,122.39	-	5,122.39	5,124.39	-	5,124.39	5,142.57	-	5,142.57	5,136.97	-	5,136.97	5,100.38	-	5,100.38	5,054.87	-	5,054.87
Circle Telephone Co.	2,043.42	-	2,043.42	2,591.42	-	2,591.42	2,043.92	-	2,043.92	2,038.17	-	2,038.17	2,038.17	-	2,038.17	2,043.92	-	2,043.92
North Country Telephone	5,600.93	-	5,600.93	5,590.39	-	5,590.39	5,561.05	-	5,561.05	5,531.53	-	5,531.53	5,518.27	-	5,518.27	5,507.43	-	5,507.43
Total	394,429			395,140			394,580			392,451			391,251			388,898		

Current Period CCL includes CCL distributions specific to the distribution period and distribution date. No shortage or distributions for other periods are included.

Shortages are reflected in the periods they apply to.

Totals are rounded to the nearest integer

Period	Pooled AUSAC CCL Support Paid For 2016																	
	7/1/2016			8/1/2016			9/1/2016			10/1/2016			11/1/2016			12/1/2016		
	Current Period CCL	CCL Shortage	Total	Current Period CCL	CCL Shortage	Total	Current Period CCL	CCL Shortage	Total	Current Period CCL	CCL Shortage	Total	Current Period CCL	CCL Shortage	Total	Current Period CCL	CCL Shortage	Total
Distribution date	8/30/2016	9/30/2016		9/30/2016	10/28/2016		10/28/2016	11/30/2016		11/30/2016	12/30/2016		12/30/2016	1/30/2017		1/30/2017	2/28/2017	
Adak Eagle Enterprises	39,573.07	2,788.93	42,362.00	29,579.63	12,719.31	42,298.94	31,176.51	11,161.92	42,338.43	30,892.75	11,497.03	42,389.78	31,437.35	10,936.15	42,373.50	33,330.58	9,061.89	42,392.47
ATC	59,877.02	4,243.03	64,120.05	45,067.34	19,366.35	64,433.69	48,086.28	17,236.19	65,322.47	48,755.70	18,148.31	66,904.01	49,607.57	17,293.14	66,900.71	52,796.37	14,392.35	785,988
BBTC	22,373.59	1,589.91	23,963.50	17,581.36	7,549.39	25,130.75	18,956.00	6,784.25	25,740.25	18,908.73	7,067.27	25,976.00	19,352.72	6,752.66	26,105.38	20,506.42	5,607.58	26,114.00
Bettles	285.47	20.61	306.08	187.89	87.91	275.80	227.36	68.75	296.11	197.85	87.13	284.98	230.73	94.17	324.90	275.46	55.72	331.18
Bush-Tell	18,091.57	1,285.38	19,376.95	13,635.62	5,859.77	19,495.39	14,465.67	5,162.13	19,627.80	14,188.62	5,303.20	19,491.82	14,565.01	5,056.56	19,621.57	15,395.12	4,170.86	19,565.98
Nushagak	28,868.00	2,040.77	30,908.77	21,714.99	9,336.23	31,051.22	23,048.45	8,266.19	31,314.64	22,893.98	8,547.69	31,441.67	23,390.54	8,142.30	31,532.84	25,036.19	6,808.25	31,844.44
OTZ	42,142.29	2,971.83	45,114.12	31,431.72	13,491.26	44,922.98	33,137.47	11,866.75	45,004.22	32,842.97	12,257.74	45,100.71	33,513.95	11,675.75	45,189.70	35,381.22	9,613.11	44,994.33
Summit	17,449.26	1,253.73	18,702.99	13,071.94	5,618.41	18,690.35	13,783.60	4,945.85	18,729.45	13,679.86	5,103.07	18,782.93	13,959.34	4,848.18	18,807.52	14,782.98	4,028.13	18,811.11
United KUC	17,484.94	1,222.92	18,707.86	13,071.94	5,614.90	18,686.84	13,783.59	4,947.84	18,731.43	13,679.86	5,091.12	18,770.98	13,959.34	4,865.48	18,824.82	14,874.80	4,031.50	18,906.30
United Utilities	105,908.81	7,530.39	113,439.20	79,505.33	34,119.47	113,624.80	83,753.11	29,999.23	113,752.34	82,814.04	30,883.07	113,697.11	84,505.91	29,415.93	113,921.84	89,554.89	24,328.82	113,883.71
Yukon	4,781.60	323.54	5,105.14	3,569.96	1,545.64	5,115.60	3,779.83	1,334.57	5,114.40	3,787.40	1,410.80	5,198.20	3,893.62	1,349.77	5,243.39	4,131.89	1,111.19	5,243.08
Circle Telephone Co.	2,038.17	-	2,038.17	2,049.67	-	2,049.67	2,038.17	-	2,038.17	2,043.92	-	2,043.92	2,043.92	-	2,043.92	-	-	2,043.92
North Country Telephone	5,513.28	-	5,513.28	5,498.35	-	5,498.35	5,557.01	-	5,557.01	5,602.65	-	5,602.65	5,599.29	-	5,599.29	-	-	5,596.50
Total	389,658			391,274			393,567			395,685			396,489			396,916		

Current Period CCL includes CCL distributions specific to the distribution period and distribution date. No shortage or distributions for other periods are included.

Shortages are reflected in the periods they apply to.

Totals are rounded to the nearest integer

Alaska Universal Service Administrative Company

COLR, CCL, and DEM Support Paid for 2016

12/5/2018

Period	AUSAC DEM Support Paid For 2016																		
	1/1/2016			2/1/2016			3/1/2016			4/1/2016			5/1/2016			6/1/2016			
	Current Period DEM	DEM Shortage	Total	Current Period DEM	DEM Shortage	Total	Current Period DEM	DEM Shortage	Total	Current Period DEM	DEM Shortage	Total	Current Period DEM	DEM Shortage	Total	Current Period DEM	DEM Shortage	Total	
Distribution date	2/29/2016			3/30/2016			4/29/2016			5/30/2016			6/30/2016			7/29/2016	8/30/2016		
Summit	1,072.08	-	1,072.08	1,072.08	-	1,072.08	1,072.08	-	1,072.08	1,072.08	-	1,072.08	1,072.08	-	1,072.08	987.49	84.59	1,072.08	
United-KUC	24,758.92	-	24,758.92	24,758.92	-	24,758.92	24,758.92	-	24,758.92	24,758.92	-	24,758.92	24,758.92	-	24,758.92	22,805.44	1,953.48	24,758.92	
UUI	86,595.08	-	86,595.08	86,595.08	-	86,595.08	86,595.08	-	86,595.08	86,595.08	-	86,595.08	86,595.08	-	86,595.08	79,762.33	6,832.75	86,595.08	
Total	112,426			112,426			112,426			112,426			112,426			112,426			112,426

Current Period DEM includes DEM distributions specific to the distribution period and distribution date. No shortage or distributions for other periods are included.

Shortages are reflected in the periods they apply to.

Totals are rounded to the nearest integer

Period	AUSAC DEM Support Paid For 2016																				
	7/1/2016			8/1/2016			9/1/2016			10/1/2016			11/1/2016			12/1/2016					
	Current Period DEM	DEM Shortage	Total	Current Period DEM	DEM Shortage	Total	Current Period DEM	DEM Shortage	Total	Current Period DEM	DEM Shortage	Total	Current Period DEM	DEM Shortage	Total	Current Period DEM	DEM Shortage	Total	Total DEM Support Paid For 2016		
Distribution date	8/30/2016	9/30/2016		9/30/2016	10/28/2016		10/28/2016	11/30/2016		11/30/2016	12/30/2016		12/30/2016	1/30/2017		1/30/2017	2/28/2017				
Summit	-	1,072.08	1,072.08	-	1,072.08	1,072.08	-	1,072.08	1,072.08	-	1,072.08	1,072.08	-	1,072.08	1,072.08	-	1,072.08	1,072.08	-	12,865	
United-KUC	-	24,758.92	24,758.92	-	24,758.92	24,758.92	-	24,758.92	24,758.92	-	24,758.92	24,758.92	-	24,758.92	24,758.92	-	24,758.92	24,758.92	-	297,107	
UUI	-	86,595.08	86,595.08	-	86,595.08	86,595.08	-	86,595.08	86,595.08	-	86,595.08	86,595.08	-	86,595.08	86,595.08	-	86,595.08	86,595.08	-	1,039,141	
Total	112,426			112,426			112,426			112,426			112,426			112,426			112,426		1,349,112

Current Period DEM includes DEM distributions specific to the distribution period and distribution date. No shortage or distributions for other periods are included.

Shortages are reflected in the periods they apply to.

Totals are rounded to the nearest integer

TA28-998

Attachment C

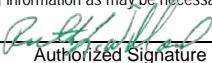
Access Line Data

Third Supplemental
December 5, 2018



State of Alaska
Universal Service Fund
ACS-Fairbanks Non-Remote Access Line
Form

Complete the highlighted sections and Section 3

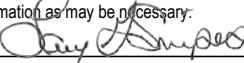
SECTION 1 - CARRIER IDENTIFICATION			
1. Company Name:	ACS of Fairbanks, Inc		
1.a. Complete Mailing Address:	600 Telephone Avenue Anchorage, AK 99503		
1.b. Telephone:	907-564-1935		
SECTION 2 - ACS-FAIRBANKS ACCESS LINE CALCULATION			
Study Area:			
	January 2016 Access Lines (A)	December 2016 Access Lines (B)	Average Access Lines (C)
2. Total Access Lines (Remote & Non-Remote)	15,952	14,796	15,374
3. Study Areas			
Fairbanks Zone #1 (Non-Remote Only)	6,374	6,059	6,217
			-
Non-Remote Access Lines Total	6,374	6,059	6,217
4. Percent Non-Remote Access Lines	39.96%	40.95%	40.44%
SECTION 3 - CERTIFICATION			
Under penalties as provided by law, I certify that I have examined this report and to the best of my knowledge and belief it is true, correct, and complete. I further acknowledge AUSAC's authority to request additional supporting information as may be necessary.			
5. <u>12/03/18</u>	Ruth Willard		Sr. Director, Revenue Mgmt
Date	Name	Authorized Signature	Title
6. <u>Ruth Willard</u>	Sr. Director, Revenue Mgmt	907-564-1967	Phone Number
Contact Name	Contact Title		
7. Signer's Mailing Address:	MS - 37 - PSC 1st Floor, 600 Telephone Avenue, Anchorage, AK 99503		

Send worksheet to:

Alaska Universal Service Administrative Company
810 N St, Suite 204
Anchorage, AK 99501
Phone: (907) 561-6300 Fax: (907) 561-6303 Email: info@ausac.org

State of Alaska
Universal Service Fund
MTA Non-Remote Access Line
Form

Complete the highlighted sections and Section 3

SECTION 1 - CARRIER IDENTIFICATION																																							
1. Company Name:	MTA																																						
1.a. Complete Mailing Address:	1740 S Chugach Way Palmer AK 99645																																						
1.b. Telephone:	907-761-2440																																						
SECTION 2 - MTA ACCESS LINE CALCULATION																																							
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<p>Under penalties as provided by law, I certify that I have examined this report and to the best of my knowledge and belief it is true, correct, and complete. I further acknowledge AUSAC's authority to request additional supporting information as may be necessary.</p>																																							
5. <u>12/04/18</u>	<u>Larry G. Snipes</u>		Manager, Regulatory Affairs																																				
Date	Name	Authorized Signature	Title																																				
6. <u>12/4/2018</u>	<u>Larry G. Snipes</u>	Manager, Regulatory Affairs	907.761.2746																																				
	Contact Name	Contact Title	Phone Number																																				
7. Signer's Mailing Address:	<u>1740 S. Chugach St., Palmer, AK 99645</u>																																						

Send worksheet to:

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